

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

FILED

AUG 31 2012

IN RE:)
ONE 2007 JEEP GRAND CHEROKEE)
VIN: 1J8HR48N87C689206)
WITH ALL ACCESSORIES,)
ATTACHMENTS, AND COMPONENTS)
THEREON)

STEPHEN C. WILLIAMS
U.S. MAGISTRATE JUDGE
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

Case No. 12-mj-7070-SCW

FILED UNDER SEAL

**APPLICATION AND AFFIDAVIT
FOR SEIZURE WARRANT**

Comes now Special Federal Officer Mark Alan Krug and hereby states under penalty of perjury:

This affidavit is being submitted in support of a seizure warrant for:

**ONE 2007 JEEP GRAND CHEROKEE VIN: 1J8HR48N87C689206, WITH ALL
ACCESSORIES, ATTACHMENTS, AND COMPONENTS THEREON**

I am a Special Federal Officer of the Federal Bureau of Investigation (FBI) assigned to the Springfield Cyber Crimes Task Force (SCC) in the Fairview Heights, Illinois, Resident Agency. I have been so assigned for approximately 6 years. I have been a sworn police officer for over 17 years. During this time I have investigated and assisted in the investigation of a variety of federal and state offenses involving children, including the online exploitation of children, the possession, receipt, and transmission of digital images of child pornography, and sexual offenses against children. In addition to my involvement in assisting or conducting such investigations, I have also gained knowledge, experience and training in such investigations through training seminars, classes, and work with other state and federal cyber-crimes investigators. I speak regularly with FBI experts in the field and state and local forensic computer examiners, receive training in the search and recovery

of computers, peripherals, cell phones, computer data, imaging computer hard drives, and interpreting on-line computer activity from data logs and internet service providers, and I have conducted forensic examinations of computers in which computer files containing videos and pictures of child pornography were recovered months and years after they were originally downloaded. Through my training and experience, I have learned about the habits of child pornography collectors, distributors, and producers, those who exploit children on-line, and those who commit sexual offenses against children.

The statements contained in this affidavit are based in part on information provided by other agents, on reports provided by and conversations with other law enforcement officers, on information provided by witnesses, and on my experience and background as a Special Federal Officer with the Federal Bureau of Investigation (FBI), assigned to the Springfield Cyber Crimes Task Force and as a Detective with the Collinsville Police Department.

Case Investigation

1. The investigation into the activities of Matthew Staszak, age 29, began on or about May 25, 2012. At that time, Staszak, a member of the U.S. Navy, was stationed at Parris Island Marine Depot, Beaufort, South Carolina. On June 8, 2012, Staszak was arrested by the FBI in South Carolina on a Criminal Complaint obtained in this district. On June 20, 2012, the Grand Jury for the Southern District of Illinois returned an indictment, *United States v. Matthew Staszak*, Criminal No. 12-CR-40064-JPG, charging Staszak with violating Title 18, United States Code, Section 2251(a) (Production of Child Pornography), and Title 18, United States Code, Section 2423(a) (Travel With Intent to Engage in Illicit Sexual Conduct). The offenses concern a minor who will be identified herein as [REDACTED]

2. While the investigation was ongoing, on June 8, 2012, the defendant was interviewed by FBI Special Agent George Graves of the Hilton Head Resident Agency, South Carolina, following advice of rights, regarding his relationship with [REDACTED]. He made various admissions regarding his ongoing illicit sexual relationship with [REDACTED], including but not limited to the following:

- a. The defendant admitted exchanging posts with [REDACTED] on Facebook beginning in 2010 before he met her in person.
- b. The defendant admitted his sexual relationship with [REDACTED] started in 2010 when she and her family moved to [REDACTED]. At that time, she was [REDACTED] and he was 27. Their relationship continued through the time of his interview with the FBI.
- c. The defendant admitted having sexual intercourse with [REDACTED] in four states, and specifically at locations in [REDACTED] within the Southern District of Illinois, when [REDACTED] was [REDACTED].
- d. On one occasion in [REDACTED], the defendant used his cellular telephone to record the two of them engaged in sexual activity. He claimed he deleted the recording the same day it was made.
- e. The defendant admitted that when not in [REDACTED]'s company, he used his cellular telephone to maintain contact with [REDACTED], that he used it to receive what he described as topless photographs of [REDACTED]. ([REDACTED]'s description of the photographs would constitute child pornography), which he may or may not have deleted, and that he used it to send [REDACTED] pictures of his genitalia.
- f. The defendant admitted that he purchased a cellular telephone for [REDACTED] and added her to his Verizon contract. The defendant stated that he has not changed his cellular telephone or cellular telephone number since his relationship with [REDACTED] began.

3. On May 28, 2012, SFO Patrick Parker and I video-recorded interviews of [REDACTED] and her mother. In relevant part, [REDACTED] stated that Staszak contacted her on Facebook

when she was [REDACTED] years old. She said she told him her age. [REDACTED] said she and Staszak first had sexual intercourse when she was [REDACTED] years old and living in [REDACTED] with her mother (her parents had separated). [REDACTED]'s mother drove her to South Carolina where they met with Staszak, and then Staszak drove her to his home in North Carolina and had sex with her. She also used a small laptop computer belonging to Staszak during this time. She said Staszak visited her twice in [REDACTED] and they had sexual intercourse during both visits. [REDACTED] said that she and her mother moved to Southern Illinois, where they have family, when she was still [REDACTED], and Staszak visited her there. She said they had sexual intercourse at various locations in the Southern District of Illinois, including hotels, Staszak's mother's home, and Staszak's grandmother's home, all in [REDACTED]. [REDACTED] stated that Staszak would drive his Jeep and pick her up during these sexual encounters.

4. I also interviewed an associate of Staszak. During this interview, the associate advised that Staszak owned a Jeep in South Carolina and that it is now in Southern Illinois at Staszak's father's residence at [REDACTED], Johnson City, Illinois, which is located within the Southern District of Illinois. To the best of the associate's knowledge, Staszak is the sole owner of the Jeep, and it is paid off.

5. I then contacted Special Agent (SA) Kelley Parrish of the Naval Criminal Investigative Service (NCIS). SA Parrish checked Naval records and provided information that Staszak had a 2007 Jeep Grand Cherokee with VIN 1J8HR48N87C689206 registered to him with South Carolina registration 6168FL.

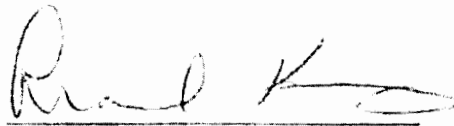
6. I checked South Carolina vehicle records and found that the 2007 Jeep Grand Cherokee (VIN: 1J8HR48N87C689206) was registered to Staszak in South Carolina and was issued registration plate 6168FL.

7. On August 2, 2012, a hearing was held in the U.S District Court for the Southern District of Illinois in Benton, Illinois. Staszak appeared in court as required. Outside of the federal courthouse was parked a silver 2007 Jeep Grand Cherokee bearing South Carolina registration plate 6168FL. I took a photo of the vehicle. This photo was later shown to [REDACTED], who positively identified it as the vehicle that Staszak used when he picked her up to engage in the sexually explicit conduct as described above.

CONCLUSION


Based on the forgoing, I believe that the property that is the subject matter of this application constitutes property used or intended to be used to commit or to facilitate the commission of violations of 18 U.S.C. § 2423(a) and is thereby forfeitable civilly pursuant to 18 U.S.C. § 2428(b)(1)(A).

FURTHER AFFIANT SAYETH NAUGHT.



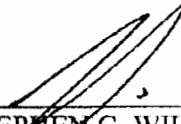
MARK KRUG
Special Federal Officer
Federal Bureau of Investigation

APPROVED:


Assistant United States Attorney

State of Illinois)
) SS.
County of St. Clair)

Sworn to before me, and subscribed in my presence on the 31st 24th day of August,
2012, at East St. Louis, Illinois.



STEPHEN C. WILLIAMS
United States Magistrate Judge